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10           IN THE UNITED STATES DISTRICT COURT

11           FOR THE DISTRICT OF ARIZONA

12           UNITED STATES OF AMERICA,    } 4:16-cr-01749-RM-1  
13    }  
14           Plaintiff,    }  
15    }  
16           v.    }  
17    }  
18           Jesus Gonzalez Arellano,    }  
19    }  
20    }  
21    }  
22    }  
23    }  
24    }  
25    }  
26    }

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15           COMES NOW the Defendant, Jesus Arellano, by and through his undersigned  
16           counsel, and hereby submits this his response/objection to paragraphs 55 and 60 of the  
17           Presentence Investigation Report (“PSR”)

18           I.        RESPONSE/OBJECTION TO PARAGRAPH 55

19           The presentence writer writes in Paragraph 55 that Mr. Arellano did not  
20           complete financial paperwork outlining his current earnings , debts, monthly expenses  
21           and other documentation to support his claims regarding his financial status. This  
22           statement is incorrect. Mr. Arellano filled out and completed a lengthy financial report  
23           and provided a great deal of records including tax returns, bank records and other

information regarding his job, financial condition and background. Mr. Arellano (and his attorney) also informed the presentence writer that he had been supporting himself since the filing of charges in this case by borrowing from his federal retirement savings plan (“T.S.P.”).

## II. RESPONSE/OBJECTION TO PARAGRAPH 60

The presentence writer writes in Paragraph 60 that the source of the funds used to hire undersigned counsel is “unknown.” However, the presentence writer was informed by undersigned counsel that Mr. Arellano borrowed from his T.S.P. to hire counsel.

To the extent, therefore, that the presentence writer intends to suggest that Mr. Arellano has some undisclosed (and nefarious) source of income, he is simply incorrect. Mr. Arellano suffers from depression and PTSD as a result of the charges in this case. He has also been financially devastated by the indictment in this matter. He has done his level best to provide the presentence writer with all the information that he requested. (Counsel will note that he and his secretary have had multiple interactions with the presentence writer and Mr. Arellano to facilitate the disclosure of as much financial information as possible.)

Respectfully submitted this 23rd day of February, 2019.

## LAW OFFICES OF SEAN CHAPMAN, P.C.

BY: /s/ Sean Chapman  
Sean Chapman

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2                   **CERTIFICATE OF SERVICE**  
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4 I hereby certify that on February 7, 2019, I electronically transmitted the attached document to the  
5 Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to  
6 the following CM/ECF registrants:  
7

8 Hon. Rosemary Marquez  
9 United States District Court  
10

11 Gordon Davenport  
12 Assistant United States Attorney  
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